

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION

ARC CONTROLS, INC.,)	
Plaintiff,)	
)	
v.)	
)	CASE NO. 1:19-cv-391-LG-RPM
)	
M/V NOR GOLIATH, <i>in rem</i> , and)	<i>Consolidated with:</i>
GOLIATH OFFSHORE HOLDINGS PTE.)	CASE NO. 1:19-cv-395-HSO-JCG
LTD., <i>in personam</i>)	
_____)	

DECLARATION OF RICHARD M. CURRENCE, JR.

Pursuant to 28 U.S.C. 1746, Declarant Richard Currence, Jr. (“Declarant”) does hereby declare, certify, and verify under penalty of perjury under the laws of the United States of America that the following is true and correct:

1. I am a person of the full age of majority, a resident of the State of Louisiana and competent to make this Declaration based on my personal information and knowledge.
2. I am the Owners’ Representative of Goliath Offshore Holdings, Pte. Ltd, a foreign corporation and owner of the M/V NOR GOLIATH and provide industry knowledge to the Owners regarding the operations of the M/V NOR GOLIATH. (collectively, “Goliath”).
3. I have an extensive background in vessel operations and offshore construction and structural decommissioning in the Gulf of Mexico. I am very familiar with the M/V NOR GOLIATH, its equipment and operations and have boarded and worked aboard the vessel many times over the past six years.

EXHIBIT A

4. Goliath Offshore Holdings Pte. Ltd. is the owner of the M/V NOR GOLIATH (“vessel”), a self-propelled oceangoing ship equipped with cranes to perform heavy lifts for construction and in some cases platform decommissioning
5. The vessel is approximately 590.6 feet in length and 105 feet in width and is equipped with a Liebherr MTC 78000-1400 (1600 Metric Ton) Litronic crane and two Liebherr CBO 3600-100 (70 Metric Ton) Litronic auxiliary cranes.
6. The vessel is flagged out of the Marshall Islands and bears IMO Registration Number 9396933.
7. The M/V NOR GOLIATH could perform its function and has performed its function of performing heavy-lifts and decommissioning of oil and gas platforms without the use of material barges.
8. The M/V NOR GOLIATH has lifted entire platform components and moved those components on its own propulsion to another location for use in a Rig-to-Reef project without any assistance from another vessel or material barge.
9. In July of 2018, the vessel performed just such a project during the removal of the WC-504-A platform for Enven during a charter for Ranger/Epic. Project plans, drawings and photographs are attached and came from the vessel records.
10. A photograph of the M/V NOR GOLAIETH holding an offshore well jacket while underway to another location is attached to my Declaration. The photograph is taken from the vessels’ website.

Dated: June 9, 2021



Richard M. Currence, Jr.



Image: NOAA/FGBNMS/Schmahl

GOLIATH OFFSHORE HOLDINGS PTE LTD

NOR GOLIATH

Nor Goliath is a DP3 inspection, maintenance, repair and heavy lift vessel with accommodation for 296 people. She is equipped with one 1,600mt Liebherr main crane and two 70mt auxiliary cranes and 4,200 m2 flush deck cargo space.

VESSEL SPECIFICATIONS:

- Build: 2009
- Flag: Marshall Islands
- Class: ABS + A1 + E + AMS + ACCU + ICE CO + DP3 + HELIDECK + ES + FiFi
- Length (overall): 590.6 ft (180.0 m)
- Width: 105.0 ft (32.0 m)
- Draft (design/max): 24.6 ft (7.5 m)
- Draft (mean): 21.3 ft (6.5 m)
- Draft (max with retractable thrusters extended): 38.0 ft (11.6 m)
- Accommodation: 296
- Main crane: Liebherr MTC 7800-1400 (1600) Litronic, 1,600mt / 80m hook height

**EXHIBIT
B**

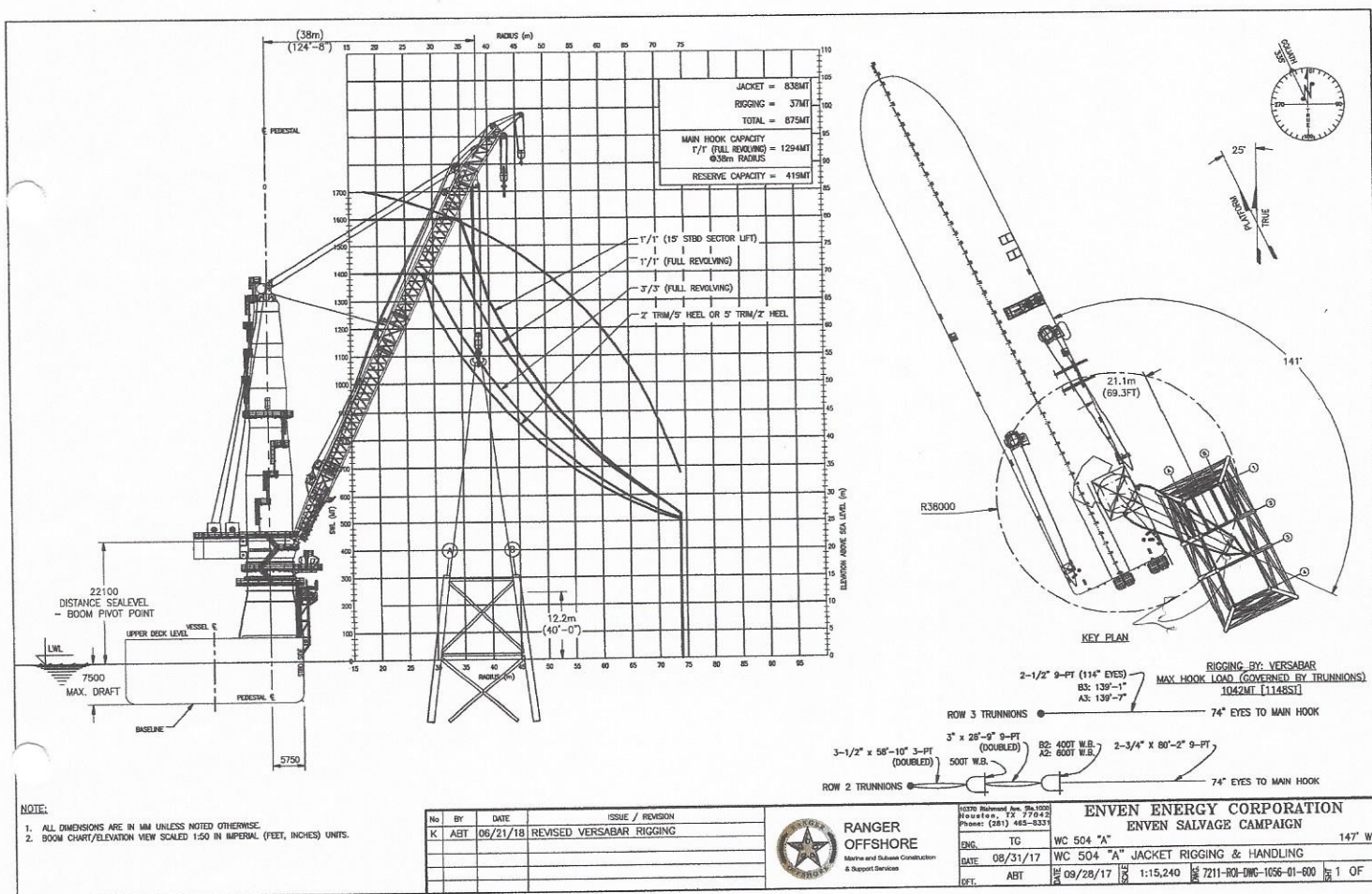


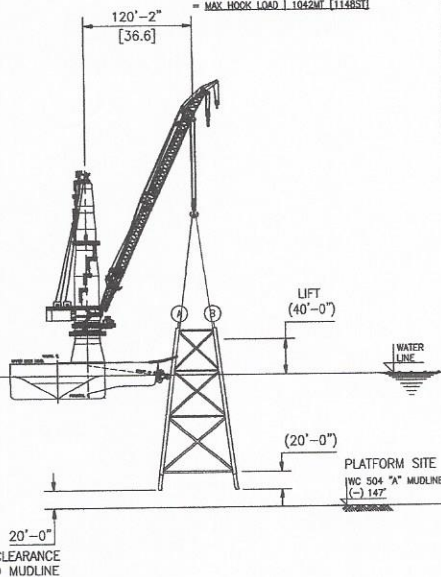
EXHIBIT
C

STEP 1: JACKET TOW

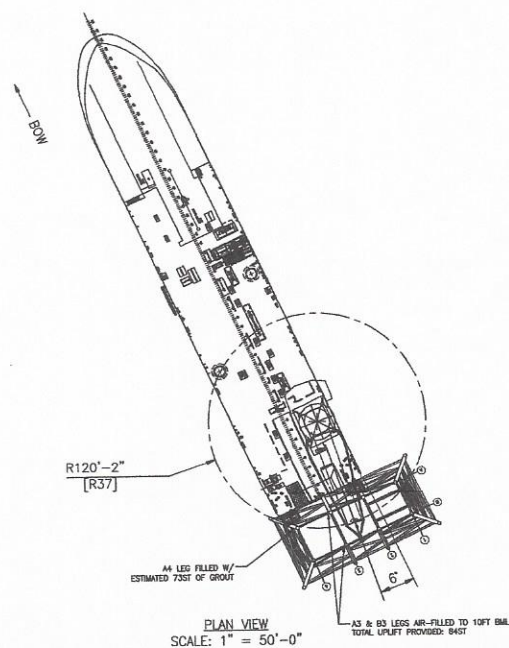
1. INSTALL JACKET-TO-GOLIATH SECUREMENT RIGGING.
2. PLACE SALVAGE BUMPERS OFF OF STERN.
3. LIFT JACKET 40'-0" PER RANGER JACKET LIFT/HANDLING DRAWING 01-600.
4. SLEW AFT AT APPROX. 37m RADIUS TO PLACE JACKET OFF STERN.
5. SECURE JACKET IN POSITION FOR TOW.

JACKET = 838MT
RIGGING = 37MT
TOTAL = 875MT
MAIN HOOK CAPACITY 1" / 1" (FULL REVOLVING) = 1335MT Ø37m RADIUS
RESERVE CAPACITY = 460MT

MAX PULL COMPONENT WEIGHT | 1005 MT [1107 ST]
+ RIGGING WEIGHT | 37MT [415 ST]
= MAX HOOK LOAD | 1042MT [1148ST]



JACKET ORIENTATION,
SALVAGE BUMPER PLACEMENT,
JACKET SEPARATION FROM
SIDE SHELL, AND SOFT LINES
TO VESSEL CHECKS TO BE AT
FIELD SUPERVISORS DISCRETION.



PLAN VIEW
SCALE: 1" = 50'-0"

REEF SITE
WC 504 MUDLINE
(-236')

20'-0"
MINIMUM CLEARANCE
JACKET TO MUDLINE

NOTES:

NO	BY	DATE	ISSUE / REVISION
K	ABT	12/13/17	CORRECTED "MAX PULL COMPONENT WEIGHT"
L	ABT	05/16/18	REVISED TOW ORIENTATION
M	ABT	06/12/18	REVISED RIGGING WEIGHT & TOW POSN.



**RANGER
OFFSHORE**

Marine and Subsea Construction
& Support Services

16239 Redwood Ave. Ste. 1000
Houston, TX 77042
Phone: (281) 465-8331
FAX: (281) 465-8332
ENG. TG
DATE 08/31/17
OFF. ABT

ENVEN ENERGY CORPORATION
ENVEN SALVAGE CAMPAIGN

WC 504 "A"
PHASE 1 - WC 504 "A" JACKET TOPPLING & REEF SITE
1" = 100'-0" 7211-ROU-DWG-1056-01-60 147' WD
1 OF 2

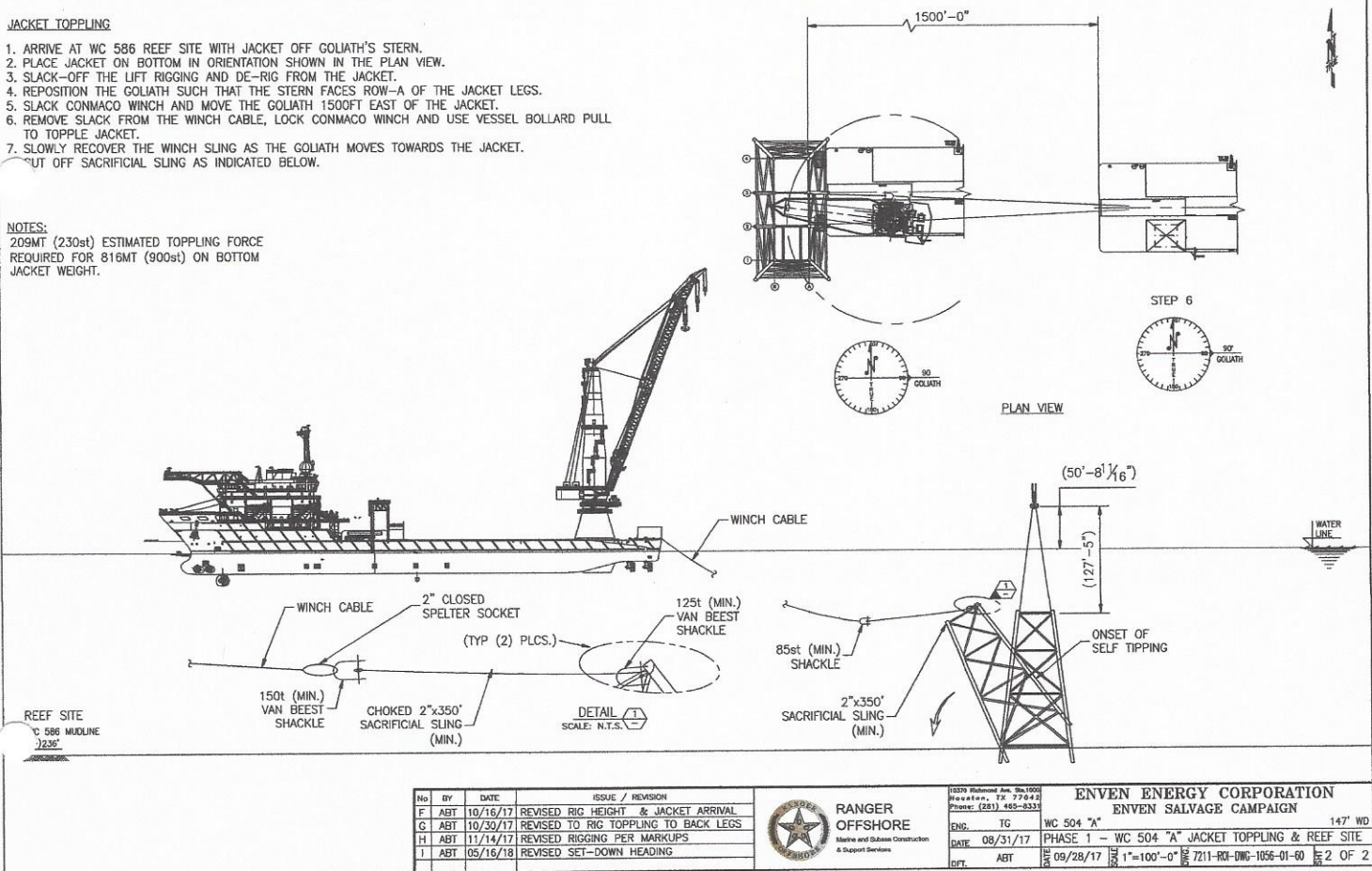
JACKET TOPPLING

1. ARRIVE AT WC 586 REEF SITE WITH JACKET OFF GOLIATH'S STERN.
2. PLACE JACKET ON BOTTOM IN ORIENTATION SHOWN IN THE PLAN VIEW.
3. SLACK-OFF THE LIFT RIGGING AND DE-RIG FROM THE JACKET.
4. REPOSITION THE GOLIATH SUCH THAT THE STERN FACES ROW-A OF THE JACKET LEGS.
5. SLACK CONMACO WINCH AND MOVE THE GOLIATH 1500FT EAST OF THE JACKET.
6. REMOVE SLACK FROM THE WINCH CABLE, LOCK CONMACO WINCH AND USE VESSEL BOLLARD PULL TO TOPPLE JACKET.
7. SLOWLY RECOVER THE WINCH SLING AS THE GOLIATH MOVES TOWARDS THE JACKET.

CUT OFF SACRIFICIAL SLING AS INDICATED BELOW.

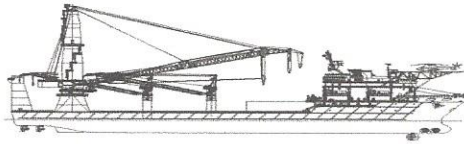
NOTES:

209MT (230st) ESTIMATED TOPPLING FORCE
REQUIRED FOR 816MT (900st) ON BOTTOM
JACKET WEIGHT.





NOR Goliath Heavy Lift



Steps to be Taken

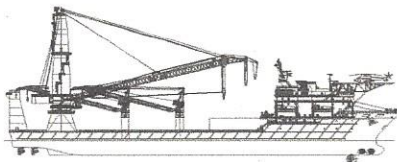
Lifting of Jacket and swing it to stern to be transported to reefing site

Place vessel on required heading on the lifting side of the jacket
HiPaP and Taut wire will be available for DP operations
DGPS's will be available for DP operations
All thrusters to be enabled for DP
3 Generators per bus to be on line prior starting lifting
DP system to operate on DP3 mode
All controllers to be rebooted
Ballasting from 13 stbd to 13 port will take place 2.5 hr. prior lift commence
While doing so, keep AH system in automatic mode
Make lift with MTC first pull of around 200tons
And then it's time to start transferring water from starboard to port with AH system IN MANUAL MODE while monitoring the load on MTC

The lifting will continue by stages with stops each determined weight according to the directions of the captain.
Once the jacket has taken off from the seabed and it is in a safe suspended position, give control to crane operator and Ranger people
Vessel to hold position until Ranger superintendent instructs to move away
Load will be swung to the Center line on the aft
Load will be held suspended on stern to be towed to reef site
Vessel to steam at 0.5-1 knt to the reef site.
Vessel to set on DP mode on reef location
Landing of jacket on seabed Hoppe to transfer water to starboard
And also ballast water to be transferred from 13P to 13S until all load is gone and vessel zero list.



NOR Goliath Heavy Lift



OverView

Lifting of Jacket and swing it to stern to be transported to reefing site

(Lift will be conducted on the stern of main crane base and then swung to the CL to be tugged to reef site)

Basic steps as follows :

Place vessel on required heading and approach platform

Ballasting to be ready prior lift commence

Make lift with MTC first pull of around 200tons and observe footprint

Once observed all ok, MTC to come up on the hook until one degree list to stbd is reached approx 450tons load

Proceed then with Hoppe in MANUAL mode to transfer water to port side and crane operator to be advising as the load increases

Master to determine when to stop the Hoppe and wait for the jacket to brake the mud suction to avoid sudden excessive list

Once the jacket is free from bottom, give control to crane operator and Ranger people

Vessel to hold position until Ranger superintendent instructs to move away

Load will be held suspended on stern side for towing to reef site

Vessel to steam at 0.5-1 knt to the reef site.

Vessel to set on DP mode on reef location

Landing of jacket on seabed Hoppe to transfer water to starboard

And also ballast water to be transferred from 13P to 13S until all load is gone and vessel zero list.







